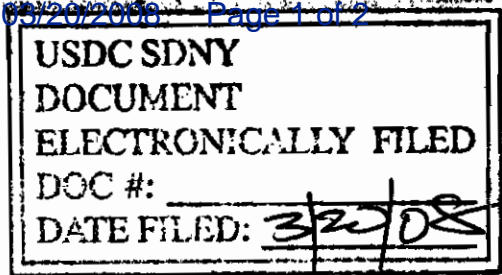


VIA HAND DELIVERY

Honorable Richard J. Sullivan
United States District Court
Southern District of New York
500 Pearl Street, Room 615
New York, New York 10007



Re: Serrano v. Ultradent Products, Inc.
Index No.: CV 3685-07
Joint Letter Re: Discovery Disputes

Dear Judge Sullivan:

As you know, the firm of Segal McCambridge Singer & Mahoney, Ltd represents Defendant Ultradent Products, Inc. and John J. Tracy from Tracy & Stillwell, P.C. represents the Plaintiff in the above-referenced case.

Defendant, Ultradent Products, Inc.

According to the current case management schedule, depositions were to be completed by March 4, 2008 and *all fact* discovery completed no later than March 21, 2008. Defendant and Plaintiff are requesting an extension of the discovery dates. Defendant is currently waiting for medical records to be received through HIPAA authorizations because the medical records received to date do not include records pertaining to treatment for the years 2006, 2007, or 2008. Additionally, Defendant is waiting for records from Plaintiff's employer, social security disability and Workers' Compensation through HIPAA authorizations.

On March 10, 2008, Plaintiff served her certified answers to interrogatories and document production, which were due on February 11, 2008. Moreover, on March 10, 2008, Plaintiff also served Combined Demands, but Defendant objects to these demands since the demands are beyond the deadline of January 11, 2008. Defendant has complied with all dates within the case management plan and scheduling order.

Plaintiff, Rosalina Serrano

Plaintiff joins in defendant's application to extend the discovery deadlines in this matter.

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The reason for the delay is two-fold: . (a) disruption caused by movement of my office during weeks of December 24, 2007 to January 4, 2008; (b) my personal engagement in representation of Radiosurgery New York in the matter Radiosurgery New York, L.L.C., v. Cabrini Medical Center, et al., Index No.: 100393/08, involving plaintiffs' application to continue the practice of the Radiation Oncology Department of Cabrini operating during the Berger Commission mandated closure of the hospital. This matter has taken the daily attention of my services since the first week of January, 2008.

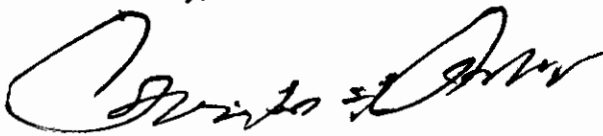
The fact discovery contained in the plaintiff's demands are critical to the plaintiff's case and solely within the knowledge of the defendants.

The parties are still within the discovery end date and capable of completing discovery by that date or within a short time thereafter, if the court permits.

The plaintiff has complied with all other mandates of the Scheduling Order , including being ready, willing and able to attend her scheduled deposition before March 4, 2008. Plaintiff has supplied to defendant copies of all social security, workers compensation records and medical records, in addition to HIPAA compliant authorizations to obtain them.

At this time, Defendant and Plaintiff request a court conference so that the discovery deadlines pertaining to the case management plan and scheduling order can be extended.

Sincerely,



Christian H. Gannon
SEGAL MCCAMBRIDGE SINGER & MAHONEY, LTD.
830 Third Avenue; Suite 400
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(212) 651-7500

and



John J. Tracy, Esq.
TRACY & STILLWELL, P.C.
1688 Victory Boulevard
Staten Island, New York 10314
(718) 720-7000

The parties are
to appear for a status
conference regarding these
matters on March 31, 2008
at 9:30 a.m.

SO ORDERED

Date

3/20/08



RICHARD J. BALLANTYNE
U.S.D.J.